

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ECOVEST CAPITAL, INC., et al.

Defendants.

Case No. 1:18-cv-05774-AT

**JOINT MOTION FOR ENTRY OF FINAL JUDGMENT
AGAINST DEFENDANTS ECOVEST CAPITAL, INC., ALAN SOLON,
RALPH TEAL, ROBERT MCCULLOUGH, AND CLAUD CLARK III**

The United States; EcoVest Capital, Inc., Alan Solon, Ralph Teal, and Robert McCullough (collectively, “the EcoVest Parties”); and Claud Clark III have negotiated the terms of a consent injunction and have filed stipulations for entry of final judgment (ECF Nos. 413 and 414). The parties have also filed a stipulated notice of voluntary dismissal regarding Clark’s counterclaim against the United States (ECF No. 415).

Accordingly, the United States, the EcoVest Parties, and Clark respectfully request that the Court enter the attached (proposed) final judgments, which will resolve all remaining claims in this case.

Respectfully submitted by:

Dated: March 13, 2023

s/ Richard G. Rose
GREGORY VAN HOEY
Maryland Bar
RICHARD G. ROSE
District of Columbia Bar No. 493454
HARRIS J. PHILLIPS
Massachusetts Bar No. 675603
JAMES F. BRESNAHAN II
Virginia Bar No. 80164
LAUREN A. DARWIT
Illinois Bar No: 6323788
Trial Attorneys, Tax Division
U.S. Department of Justice
P.O. Box 7238
Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 514-6619
Facsimile: (202) 514-6770

DAVID A. HUBBERT
Deputy Assistant Attorney General

RYAN K. BUCHANAN
United States Attorney
NEELI BEN-DAVID
Assistant U.S. Attorney
Georgia Bar No. 049788
Office of the United States Attorney
Northern District of Georgia
600 U.S. Courthouse
75 Ted Turner Drive, SW, Suite 600
Atlanta, GA 30303
Telephone: (404) 581-6303
Neeli.ben-david@usdoj.gov

Attorneys for the United States

Dated: March 13, 2023

s/ Sean Akins

Benjamin J. Razi (admitted *pro hac vice*)

Sean Akins (admitted *pro hac vice*)

Marianna F. Jackson (admitted *pro hac vice*)

Matthew V. Miller (admitted *pro hac vice*)

Nicholas Pastan (admitted *pro hac vice*)

Kandyce Jayasinghe (admitted *pro hac vice*)

Amea Frodle (admitted *pro hac vice*)

Wesline N. Manuelpillai (admitted *pro hac vice*)

COVINGTON & BURLING LLP

850 Tenth St. NW

Washington, DC 20001

Tel.: (202) 662-6000

Fax: (202) 662-6291

Email: brazi@cov.com

Thomas T. Tate

Georgia Bar No. 698879

Elizabeth L. Clack-Freeman

Georgia Bar No. 126888

ANDERSON, TATE, & CARR, P.C.

One Sugarloaf Centre

1960 Satellite Blvd., Suite 4000

Duluth, Georgia 30097

Tel: (770) 822-0900

Fax: (770) 822-9680

Email: ttate@atclawfirm.com

Email: lcfreeman@atclawfirm.com

Attorneys for the EcoVest Parties

Dated: March 13, 2023

s/ Robert C. Khayat, Jr.
ROBERT C. KHAYAT, JR.
Georgia Bar No. 416981
BRIAN D. SPIELMAN
Georgia Bar No. 596026
75 Fourteenth Street, N.E.
Suite 2750
Atlanta, Georgia 30309
Telephone: (404) 978-2750
Facsimile: (404) 978-2901
Email: rkhayat@khayatlawfirm.com
Email: bspielman@khayatlawfirm.com

Attorneys for Claud Clark III